

# **Protection Island and San Juan Islands NWRs Comprehensive Conservation Plan and Environmental Assessment Scoping Report**

April 7, 2008

## **Introduction**

This report summarizes initial outreach activities and public comments gathered for the preparation of a Comprehensive Conservation Plan (CCP) and associated National Environmental Policy Act (NEPA) document for Protection Island and San Juan Islands NWRs. The purposes of scoping are to notify the affected public of the opportunity to participate in the preparation of the CCP and encourage them to: comment on preliminary refuge vision and goals; help identify potential issues, management actions and concerns, significant problems or impacts; and opportunities or alternatives to resolve them (602 FW 3, 3.4(2b)). While public scoping will continue as we prepare a draft CCP/NEPA document, the outreach and public comments in this report represent initial CCP public scoping that ended in early spring 2008.

After public scoping the planning team reviewed and evaluated all potential issues, management concerns, and problems and the opportunities to resolve them that the planning team, other Service personnel, partners, and the public have identified in order to determine significant issues. The Service defines an issue as: “Any unsettled matter that requires a management decision, e.g., an initiative, opportunity, resource management problem, threat to the resources of the unit, conflict in uses, public concern, or the presence of an undesirable resource condition (602 FW 1 1.6 K).” Significant issues typically are those that are: within our jurisdiction, suggest different actions or alternatives, and will influence our decision (602 FW 3 sec. 3.4(3b)). The final section of this scoping report documents the selection of major issues to be addressed in the CCP.

## **Outreach Efforts**

**Federal Register Notice of Intent to Prepare a CCP** – published August 14, 2007, and included background information on the Refuges and preliminary issues with request for scoping comments.

**Planning Update #1** – Hardcopies were mailed October 1, 2007 to ~ 500 names on mailing list and additional updates were hand delivered to R1 FWS staff. At the same time electronic copies were e-mailed to ~ 6 contacts without street addresses and ~ 50 FWS staff nationwide. Throughout scoping planning update #1 was provided to refuge office visitors, partners, handed out during scoping meetings and mailed to interested parties (~180 additional copies). The Planning Update included background information on the Refuges, refuge purposes, preliminary issues, visions, goals, and four maps.

The Planning Update also included a mail-in comment form with the following questions:

- What do you see as the primary issues that need to be addressed in the Comprehensive Conservation Plan?
- What are your thoughts on the visions and goals for Protection Island and San Juan Islands National Wildlife Refuges?
- Do you have additional comments at this time?

**Media Outreach** – A news release was sent to 395 regional list serve users and it was also posted on the Service's Region 1 Website. Refuge staff sent the news release to additional local media and made follow up contacts.

**Press Coverage:** The above news release and associated follow up resulted in articles being written in the following venues. It is likely that additional articles were also produced.

- October 3, 2007. The Islands' Sounder.
- October 10, 2007. Port Townsend & Jefferson County Leader
- October 11, 2007. Peninsula Daily News
- February 8, 2008. Whidbey Examiner

### **Scoping Meetings**

Refuge Staff prepared a power point presentation which provided information about the NWR System, comprehensive conservation planning, Protection Island and San Juan Islands NWRs, and preliminary management issues. This presentation was given by the Project leader or Biological Technician at most of the scoping meetings identified below. GIS staff prepared large format maps to better illustrate the Refuges for the benefit of meeting participants.

### **Meetings with Congressional Representatives and Senators or their Aides**

Aide to Congressman Norm Dicks, March 13, 2008, Port Angeles, WA 6<sup>th</sup> District

Aide to Congressman Rick Larson, March 6, 2008, Bellingham, WA 2<sup>nd</sup> District

Aides to Senator Patty Murray, March 4, 2008, Federal Building, Seattle, WA

Aides to Senator Maria Cantwell, April 4, 2008, Federal Building, Seattle, WA

### **Meetings with Tribal Officials**

Tribal Coordination Meeting, Mount Vernon, WA - August 15, 2007

Tribal Coordination Meeting, Quilcene, WA - August 16, 2007

In July 2007, letters were sent to representatives of 14 Federally recognized Tribes associated with the Refuges' 2 treaty areas. The letters invited the tribes to participate in the CCP process and to attend 2 meetings scheduled for August 2007. Follow up calls were made to encourage their participation. No tribes attended the scheduled meetings and no comments from tribal representatives were received before, during, or after these two meetings. A follow-up letter

asking if the Tribes wished to participate in the planning process and/or had comments to send us was sent along with Planning Update #1 during the first week of October, 2007.

Tribal representatives have attended Marine Resource Committee and Northwest Straits Commission meetings (see below) where Refuge Manager, Kevin Ryan talked about the CCP.

### **Meetings with State Agency Representatives**

WDFW Region 6, Montesano WA – October 16, 2007

WDFW Region 4, North Puget Sound - Mill Creek, WA – October 22, 2007

WDFW State Office, Olympia, WA – November 1, 2007

WDNR, Seattle, WA – November 16, 2007

WSP, Northwest Regional Office, Burlington, WA - November 27, 2007

### **Meetings with Federal Agency Representatives**

NOAA/NMFS, Office of Protected Resources, Seattle, WA - November 16, 2007

USCG, 13<sup>th</sup> District Aids to Navigation, Seattle, WA – January 24, 2008

### **Meetings with Marine Resource Committees and Northwest Straits Commission**

Jefferson County Marine Resource Committee (MRC) Meeting June 5, 2007 and  
Boat Tour of Protection Island June 9, 2007

Jefferson County Marine Resource Committee (MRC) Meeting October 2, 2007

Clallam County MRC meeting, Port Angeles, WA– February 11, 2008

Island County Marine Resource Committee Meeting, Coupeville, WA November 6, 2007

Skagit County Marine Resource Committee Meeting , Anacortes, WA October 11, 2007

San Juan County Marine Resource Committee Meeting, Friday Harbor, WA – October 17, 2007

Northwest Straits Commission Meeting at Jamestown S'Klallam Tribal Office  
Sequim, WA – January 25, 2008

### **Meetings with Research Community**

Georgia Basin Puget Sound Research Conference, Vancouver, BC Canada - March 25-29, 2007

WDFW Researchers, Washington Maritime NWRC, Port Angeles, WA – December 6, 2007

Research focus group, Washington Maritime NWRC, Port Angeles, WA – December 6, 2007

Pacific Seabird Conference – February 27- March 1, 2008

Long-Term Protection Island Researchers, Protection Island, WA, - March 21, 2008.

**Meetings with Non-government Organizations**

The Nature Conservancy – January 26, 2007

Kiwanis Club, Fort Walden Commons, Port Townsend, WA – November 21, 2008

Admiralty Audubon, Port Townsend, WA - January 17, 2008

Peninsula College, Museum and Arts Center in Sequim, WA – February 15, 2008

# Summary of Comments

## Threats to Refuge Resources

### Human Disturbance to Wildlife

- Primary issues to be addressed in the CCP include protection of all refuge parcels from unauthorized human impacts.
- We recommend the CCP/EA address human disturbance to wildlife from recreational boaters and bird/wildlife watchers.
- USFWS needs to target several sources of disturbance including whale watchers and kayakers; the Victoria Clipper and its affects to Smith/Minor islands; and daily commercial bird tours around Protection Island that disturb the tufted puffins, causing them to dive repeatedly.
- Have observed flushing and disturbance of seabirds on the water from commercial crabbing and sailboats within the Protection Island 200-yard buffer.
- Ecotourism boats seem to be responsible around Protection Island.
- Harbor seal pups on Smith and Minor islands are being pushed into the water due to disturbance from vessel traffic near these remote islands. The pups end up stranded on the west side of Whidbey Island.
- Planes fly too low over the refuge islands
- Given the flight paths in the San Juans, it can be tough to keep a 2000 feet elevation restriction; boats and kayaks are really more of a problem there for wildlife.
- There are very few places in Puget Sound where wildlife is undisturbed. Protection, Smith, and Minor islands are priceless gems that need to be protected from people for the diversity and health of the Puget Sound ecosystem.
- The CCP should include a method to inventory the impact of human activities on species populations.

### Contaminants

- Multiple comments encourage USFWS to include and address water quality and oil spills as potential threats to the refuges. Some commenters specifically recommended that the CCP address: Increased oil spill prevention and oil spill response contingencies
- Navy flyers from Whidbey Island routinely use Smith Island as a target on which to dump their fuel.

### Marine Debris

- We recommend the CCP/EA address marine debris and "ghost" fishing nets adrift in marine waters.
- Marine debris is similar to fisheries by-catch in its impacts.
- What is the Service going to do about the abandoned boat on the north shoreline of Protection Island?

### Climate Change

- ❖ Multiple commenters indicated that the CCP should address potential climate change effects to the physical, chemical, and/or biological aspects of the refuge environments and explore potential mitigation strategies:

- Sea level rise
- More frequent/severe storms
- Shifts in rainfall patterns
- Fauna migration shifts along poleward shifts
- Changes in timing of breeding
- Changes in plant ranges
- Changes/disconnects between predators and presence of their prey species
- Excessive predation
- Disease

#### Deer on Protection Island

- The number of deer on Protection Island does appear to be unusually high.
- No deer were observed on the island during the 1960's through Refuge establishment. The first deer were observed between 1991- 1993.
- Deer can swim long distances therefore, it may be impossible to ever completely keep deer off of Protection Island and/or the San Juan Islands.
- Multiple comments were received that expressed concern for potential damage to rhinoceros auklet burrow nests from collapsing due to the square foot pressure exerted by deer hooves.
- Deer have been observed disturbing breeding Glaucous-winged gulls.
- Deer seem to use established paths and forage on the slopes above the marina
- I would not object to the culling of deer on Protection Island.
- Various methods for deer removal were suggested as were concerns regarding some methods: Controlled shoot by WDFW staff and/or volunteers; One-time open hunt; Disabled persons hunt for trophy bucks;
- I do not support an “open hunting season” to remove deer from the island.
- How can hunting be used as deer control if a refuge is not open for hunting?
- How could the deer be reasonably hauled off?
- Some commenters suggested donating carcasses from any deer removal efforts to the Olympic Game Farm or Wolf Haven or to a food bank .
- Is fencing the deer out of the seabird colony practical? Exclusion areas would be difficult to research without affecting seabird breeding and fencing could trap seabirds and other wildlife.
- Removing water troughs might help reduce deer numbers but there is a fresh water seep on the west bluffs that they can use.
- I think it is a good idea to provide fresh water in several places. I hate to think of deer and fawns that are not strong enough to swim back to the mainland dying of thirst beside an empty water trough.
- Deer may be attracted to the bluffs to graze on the non-native grasses. Native bunch grasses may not be quite as attractive to them.
- Deer may have some positive impacts to the island by controlling shrubs.

#### Geese

- We request the Refuge address degradation of the terrestrial systems on refuge lands by the introduced population of Canada Geese. This degradation has been documented by researchers surveying some NWR and other small Islands in San Juan County.

- Canada geese are becoming a problem in the San Juans. They graze everything down.. Until the 1990s, they were not very prevalent except in the winter.

#### Invasive Species

- We would like to see USFWS implement a weed control program that would include not only all lands under the control of USFWS but also those owned or managed by the Washington State Marine Parks or other agencies on or near the refuges since many of our boating visitors use these parks as their destinations. We would also like to encourage communication between your agency and county weed control boards to help further weed prevention, control, and education efforts.
- We recommend that non-native invasives, either floral or faunal, be noted and a strategy for abating them developed for the most ecologically important of the San Juan Islands NWR islands.
- We recommend the CCP/EA address invasive plant and animal species.
- Human introduction of mice and rats to Protection Island would be disastrous.
- Is the Refuge using rat boxes as a method of early detection?
- I hope you removed all the peacocks from Protection Island.

#### Other Comments

- Snohomish PUD has applied for a **tidal energy** facility at Admiralty Inlet. Use of tidal energy as an alternative energy source could reduce existing tidal energy by 10%. This would impact flushing rates of Hood Canal.
- Short term and cumulative threats to the refuge from potential energy development must be prohibited due to their potential for impacts to fish, wildlife, and their respective habitats.
- The CCP should address **fishery by-catch** as including it will help direct credibility and funding to the efforts off refuge as well.
- Many of the top 16 threats to marine ecosystem health identified and addressed by the Marine Stewardship Area Plan directly relate to the refuges, such as large oil spills, climate change, invasive species, and disturbance.
- We recommend that all known threats be addressed in the CCP/EA in accord with their potential to impact these refuges.
- I am pleased that there will be hazardous materials removed along with structures and invasive species.

#### ***Refuge Buffers and Nearshore Management***

- ❖ Some people had questions and concerns about refuge buffers:
  - What is a buffer?
  - What would establishing marine reserves accomplish?
  - What exactly does it mean if the public is prohibited?
  - Do buffers mean no kayaks?
- ❖ Others supported refuge buffers with exceptions for some limited access:
  - I would support a general "no landing of boats" and a 200-yard buffer exclusion zone around the island with an exception that would allow amateur scientists to access and study the island through a no-fee permitting process.

- It seems Smith and Minor islands would be prime candidates for restricted approaches like that of Protection Island, with some access for research etc.
- ❖ Many offered support for maintaining and/or establishing refuge buffers. Reasons in support of refuge buffers included:
  - Preventing disturbance of wildlife including seabirds and marine mammals.
  - Preventing disturbance specifically during the pupping season.
  - Protecting sedentary bottomfish
  - Protection of important marine resources
- ❖ Locations identified as needing buffers included:
  - Protection Island
  - Smith and Minor Islands
  - San Juan Islands
  - Low Island
- ❖ Several types of buffer mechanisms were suggested or discussed by various commenters:
  - Tideland Withdrawals
  - Public Access and Conservation Leases
  - Aquatic Reserves
  - Marine Stewardship Areas
  - Marine Protected Areas
  - WDFW Conservation areas and marine preserves which restrict certain types of fishing for science-based reasons related to fish
  - Regulated Navigation Areas
  - Using buoys to demarcate the 200-yard buffer.
  - Voluntary restrictions
- ❖ Concerns for the Service's ability to enforce buffer zones were expressed:
  - We live at Cape George and have noticed that the buffer zone around Protection Island is violated regularly. Is there a way to better control this?
  - How would the Refuge staff enforce a buffer around the Zella M. Schultz Seabird Sanctuary?
  - There needs to be a real buffer! We recommend that USFWS get WDFW on board to help with buffer control through fishing regulations as USFWS has an identity problem with the public.
  - Kayakers seem to be the worst group most often breaching the buffers.

### ***Habitat Restoration***

#### Native Plant Community

- We recommend that USFWS take this planning opportunity to better assess the importance of terrestrial biota and vegetation communities on the islands. Identifying and mapping rare flora and intact native communities would be a very worthy undertaking, and could provide guidance for necessary restoration efforts.



- Given the risk to seabird primary targets and staff funding, how feasible is it to restore Protection Island? Are historical changes to shrub/grass cover documented?
- Habitat restoration could include critical native plant communities.
- The spaces between the root systems of native bunch grasses, such as Romer's fescue, might be more ideal for burrow nesters than the invasive, shallow-rooted, rhizomatous grasses that have displaced them. The deep root systems of the bunch grasses also aid in erosion control.

#### Protection Island Wetland

- I support restoring the wetland on Protection Island, if feasible.
- Habitat restoration could include a freshwater wetland.
- The possible restoration of the Protection Island marina could include reducing it in size while still accommodating boating needs.

#### Other Comments

- Refuges can contribute to endangered species recovery, specifically for butterflies. Would USFWS consider manipulating a non-native habitat, such as planting non-native mustards for Island Marble butterflies? Is "restoration" limited to managing only native habitat? We suggest USFWS allow non-native species that support native special status species.
- There is support for using Protection Island to recover other species such as the Island marble and Taylor's checkerspot butterflies and plants. Species reintroduction should be added into the objectives of the CCP as either an ecosystem restoration or as a research proposal.
- A potential restoration project for the distal end of Violet Spit could involve burning the dense beach grass mats and smoothing the deep ruts left from roads to improve gull breeding areas. This would also improve the elephant seal haulout area and direct the gull nesting colony to the interior spit away from the driftwood edges and marina where they compete with pigeon guillemots.
- We request that USFWS analyze and disclose all wildlife and fisheries management and conservation plans in the CCP, including any "enhancement" activities that may be underway or planned for the Refuge.

### *Wildlife*

#### Seabirds

- We consider Protection Island very important because it is one of the most significant seabird nesting sites in Washington State, particularly for rhinoceros auklets, tufted puffins, pigeon guillemots and pelagic cormorants.
- I wish to voice my support for the maximum practical protection of puffins and other nesting seabirds on Protection Island and other islands within Puget Sound and the Strait of Juan de Fuca.
- We suggest that USFWS carefully evaluate any source of degradation to the nesting seabirds.
- We request that USFWS actively engage WDFW, the Tribes, and appropriate Federal agencies in evaluating the adequacy of the primary food sources for the seabirds nesting on Protection Island.
- Biodiversity in the San Juans has declined and seabirds are traveling farther to forage. In 1988, the common murrelets declined and other species have followed the same pattern. It used to be common to see arctic loons and 40,000 gulls on past Christmas counts; we do not see the

arctic loons anymore and glaucous-winged gulls are declining regionally including in the San Juans. The colony of glaucous-winged gulls on Puffin Island appears to be decreasing over the past few years. It was common to see dozens of bait balls in the waters of the San Juan Islands at any given time; but now it has been a long time since we have seen one. The marbled murrelet populations are now crashing; we hardly see them anymore. The ancient murrelets are more common.

- We've seen molting harlequin ducks on Ripple Rock and Cactus Islands and long-tailed ducks at Smith Island. There is an increasing interest in sea duck hunting with a growing guiding business for these species. I would like to see us get ahead of the curve to make sure we are protecting critical areas.
- The rhinoceros auklet breeding population needs protection and the marine protected areas should be expanded.
- I am wondering why the glaucous-winged gull colony isn't mentioned in the September 2007 planning update. At one time it was the largest colony in the state. Many of us are still concerned about how they are doing on Protection Island and elsewhere.
- There are many examples of islands with declining number of breeding gulls in the San Juan Islands, both on and off of refuge islands. Bald eagle numbers increased during the same time period. Are bald eagles eating more gulls due to lack of salmon or were gull numbers inflated prior to bald eagle recovery?

#### Marine Mammals

- Protection Island provides undisturbed habitat for elephant and harbor seals and other wildlife.
- There are density dependent signals that the state is at carrying capacity for harbor seals.
- Can a plan be developed to release stranded pups found by citizen groups on Whidbey Island to Smith and Minor islands?
- Phocine distemper - related to but different than canine distemper - has been documented in pups from Alki, Magnolia, and Tacoma.
- Stellar sea lions are more sensitive to disturbance than other pinnipeds. The sea lions can acclimate to sites with routine human activity but new activity is more disturbing. Therefore, new projects within 1 mile of a haulout site will be scrutinized as a significant disturbance.

#### Fish and marine invertebrates

- It is important to include marine fish and invertebrates in the CCP because the seabirds and marine mammals rely on them as important food sources.
- We suggest adding a WDFW fisheries biologist to the extended CCP team, adding fish species to the conservation targets, and considering the waters surrounding the islands as an interface.
- The diversity, distribution, and abundance of sardines and other prey species are changing in part due to climate change however, intertidal and shallow subtidal habitat changes are a greater concern.

#### Other Comments

- Primary issue to address in the CCP is wildlife protection and preservation.
- Top priorities for managing Protection Island should include minimizing future disturbance to vegetation, birds, mammals and other marine life.

- Protect the natural biological diversity and maintain habitat integrity, especially for breeding marine mammals, nesting seabirds and other marine life.
- The CCP should include a flexible management plan that details strong protections for all listed and imperiled species and their habitats on the Refuge. The management plan should include consistent and systematic monitoring to guide management decisions.

### ***Wilderness Management***

- We request that USFWS analyze the value of current and potential future wilderness designations in the CCP, as directed by the Service's laws and policies.
- With one CCP for such a diverse and dispersed group of islands, reefs, etc., can individual sites within the San Juan Islands NWR be managed differently?
- Because the San Juan Islands are in a busy area, people may not think of them as "wild." As such, it is even more necessary that people know that wilderness management is being done to help protect wildlife and habitat and not just to maintain a great place to see birds.
- I think some signs to keep people off the designated wilderness islands would be helpful.
- It would be great if the signs on each island would encourage the viewer to regard all uninhabited islands in the San Juans as refuges unless known otherwise. That would give our wildlife some breathing room as boaters might not come snooping at each island looking for a sign.

### ***Research***

- Multiple comments, while generally supporting research on Protection Island, advocate for careful evaluation and close supervision for impacts.
- Protection Island is easy to reach and has fantastic opportunities and potential for seabird research. We can conduct research in such a way that we don't infringe on the wilderness values of the units in the San Juans.
- Reefs and small islands are useful for subtidal and intertidal studies of aquatic marine organisms. Most field research here is conducted from spring through autumn, rather than in winter. In order for researchers to plan efficiently, it will be useful to have some general guidelines for the areas and seasons that are especially sensitive. A rapid-access permission process is also essential as much of the research is conducted by visiting scientists with brief field season windows. Preliminary inspection or survey of a site in the San Juans will often be necessary for study site selection and study design therefore; we need a process by which we can conduct reconnaissance of potential study locations as well.
- We request clear criteria for research be established that especially encourages research which will assist the Protection Island NWR in better protecting the nesting seabirds and the intricate food web on which they depend.
- Research to determine where rhinoceros auklet feeding concentrations are located could help determine marine zoning to protect their food supply.
- Research priorities should be broad as the whole marine system is changing and there are many impact dynamics on which to focus research efforts. Narrowing the priorities for research would lead to limited knowledge of processes and changes in marine life, which could impair management decisions for marine birds and mammals.

- Access to the refuge islands is very important for research. There are several examples of published intertidal studies that have used small reefs and islands in the San Juan Islands NWR (Vance 1972; Menge 1972a & b, 1974, 1975; Lubchenco and Menge 1974; Strathmann 1981). The opportunity to revisit these sites is important in order to assess changes over the intervening decades.
  - Restricted access to waters and the seafloor near the reefs and islands of the San Juan Island NWR can aid both protection of wildlife and research on organisms and habitats of the San Juan Archipelago. I am urging that extension of protected areas not limit efforts to understand marine life of this region.
  - Access for research is critical. How can research issues and the wildlife first mandate be reconciled when all research has some impact?
  - Can remote monitoring replace some on-the-ground research, resulting in less impact on Protection Island?
  - Multiple concerns were raised that research be evaluated carefully and determined to be worth the potential disturbance while being compatible with Refuge purposes.
  - Researchers could wear red suits when they are on NWR islands so that other visitors will recognize their purpose for being there.
  - There may be opportunities for collaboration between Parks Canada and USFWS in research and monitoring.
  - I would like to see the Protection Island marina dismantled and as little research as possible done on the birds.
  - In 2006, we tested a new survey method of using playback calls to survey for oystercatchers. This was super successful; we detected 90% of the oystercatchers with very low impact on the subjects.
  - WDFW biologists need to fly below the 2000 feet level to conduct surveys.
  - It is difficult to acquire adult seabirds for surveys without using artificial burrows.
- ❖ Suggested research projects include:
- Changes in vegetation and general ecology island.
  - Using prescribed burns in patches to study affects on removing non-native plants.
  - The response of gulls to creating additional edge by mowing the remnant road within the center of the spit.
  - Monitoring of gull nests
  - Differential success in gulls in differing habitat types to determine optimal nest site selection,
  - Survival rates and techniques of gull juveniles,
  - Basic biology including social stresses for future management and conservation of the spp.
  - Climatic affects and applied predictive modeling of how environmental conditions will determine location and behavior.

### *Public Uses*

#### Refuge Access and Visitation

- There were multiple comments in strong support for maintaining the “no public access allowed” status of Protection, Smith, and Minor islands and their respective marine buffers.

- Multiple comments were received in general support of a “no public access allowed” policy in order to prevent wildlife disturbances and to maintain future productivity and vitality of species populations.
- Viewing the birds and seals from boats outside of the 200-yard buffer area ensures that nests are not trampled and that people everywhere will be able to also enjoy viewing the birds after they have left the nests.
- Some comments advocate for limited access that allows education about local species and informs the public about the importance of wildlife and habitat protection.
- Would it be permissible to stop and rest on Smith Island while crossing the straight by kayak?
- Please include a plan for limited visitation to Protection Island for people who want to preserve the nesting habitat but also want to enjoy the island’s beauty. With proper management, there can be a human presence without damaging the nesting habitat of the birds or the seals pupping there. Some suggestions that work well in the Galapagos include off-season visitation times and limited permits that restrict the number of people accessing the islands.
- I would like to see an easy-to-submit, short-duration, no-fee permitting mechanism by which interested members of the public can access refuge islands to observe the flora and fauna. Specific instructions to avoid disturbance to the observed organisms should be included in the permit.
- Over 15 years of watching Swirl Rocks and the islands off of Flint Beach and the wildlife that use them, we’ve been noticing increasing human use including boaters landing on the island in dinghies to ‘explore’ and lone kayakers camping for the night. I’d appreciate it if it was a clear who to contact when violations occur.
- State Parks lacks jurisdiction outside of the 5-acre campground on Matia and cannot cite anyone for breaking regulations on the rest of the island. State attorneys have made a policy decision that no dual commissions are allowed and that they will not enforce federal regulations and laws. State Parks staff will enforce only the State’s RCWs and WACs.
- Commercial groups such as kayak outfitters, tour boats, and cruise ships that use Turn and Matia islands are required to have a commercial license and permit from State Parks. There are outfitters that do not obtain the required license and thus, are not eligible to obtain the required permit. However, many ineligible outfitters use these islands. The commercial use program is very difficult to manage well with the current resources.
- There is heavy kayak use on Turn Island.
- The Matia Island dock is in place from April to October; occasional kayakers land here outside this time period. If camping is eliminated on Matia, how would USFWS handle the overnight moorage off Matia Island or on the dock as well as landings on the tidelands?
- Motor boat numbers in the San Juans are showing a downward trend since the early 1990s, perhaps due to reduced fishing opportunities. Kayaking use has peaked/stabilize at Matia but is still increasing in the interior areas of the archipelago and south of Lopez. Kayak day trips are up while overnight trips are down.
- The public use counts reported by State Parks are acquired by counting the number of boats in the approved landing areas in Rolfe Cove, multiplied by a factor of 5 to determine a day count. The day use counts reported are probably about 25% of the actual number using the island. On Turn Island, the computed count may be even less than 25% of the actual

numbers. The reality is that Parks doesn't know what the actual use is anymore. 50,000 might be a realistic number for Turn.

- Multiple comments expressed disapproval of using Marty Bluewater as a conduit for groups to visit Protection Island under the auspices of being his guests.
- Are there sites that might be appropriate to either keep as no access, change to public access, or even trade with State Parks?

#### Wildlife Observation and Photography

- A primary issue of the CCP should include balancing the needs of the wildlife with people's desires to observe wildlife. For example, observation can be limited during sensitive life cycle times and less so at other times.
- Put more emphasis on public awareness and observation because the more people who are aware and able to observe, the more support the NWRs and CCP will have.
- State Parks, now the closest landowner to Protection Island, is considering the idea of placing a viewing scope on their beach that faces Protection Island.

#### Environmental Education/Outreach/Stewardship

- ❖ Multiple comments identified a primary issue of the CCP as the need for education and outreach to further understanding of local species, stewardship principles, and the reasons for buffers and restrictions.
- ❖ Multiple comments provided suggestions for potential partnership arrangements and collaboration in the areas of public outreach and education:
  - National Parks
  - Washington Department of Fish and Wildlife
  - Washington State Parks
  - Washington State Ferry System
  - County Parks
  - San Juan County officers
  - Sound Watch
  - SeaDoc
  - Natural History Museums
  - Parks Canada
- A specific stewardship plan and corresponding outreach/education programs about the refuges are needed to provide direction. The refuges are not very well known and therefore, aren't always getting the recognition or respect that they deserve – the San Juan Islands NWR is a gold mine; it is terribly under appreciated for its protection value as well as appropriate recreational opportunities.
- The San Juan Islands NWR provides an inherent incentive to develop a well-defined and executed stewardship plan which can be a valuable tool to support wildlife protection.
- Is it possible to institute a local wildlife and wilderness awareness component to the boat operator licensing process?
- A device with a motion sensor blue light could be installed to warn visitors that they are approaching a wilderness area or radio transmitters with informational narratives could provide notices and information.
- Are there/can there be opportunities for naturalist training of wildlife charters?

- Other ideas included: mailing information to educate slip owners and/or registered boaters regarding refuge wildlife; cooperating with NOAA to get a general marine mammal and seabird colony message into the boater safety training.

### Hunting and Fishing

- There is an increasing interest in sea duck hunting with a growing guiding business for these species. I would like to see us get ahead of the curve to make sure we are protecting critical areas like Smith Island, Ripple Rock and Cactus Islands.
- There is a lot of fishing around some of the Refuge islands such as Smith and Minor. There is a lot of crabbing around Protection Island and in the San Juans.

### Camping

- The public perception is that Turn Island is a recreational area more than it is a wildlife area. Camping use is heavy from July through mid-September and moderate from April through June and from mid-September through October with minimal winter use. The presence of legitimate campers deters others from engaging in undesirable activities, which are more common in the heavy use seasons.  $\frac{3}{4}$  of enforcement contacts in the southern San Juan Islands occur on Turn Island. Managing Turn Island as a day use only area would require more effort than that required for overnight camping use.
- Will USFWS consider making access to Matia Island by kayak only with continued overnight camping? Matia would be possible to manage as a day use only area.
- State Parks does not necessarily advocate for or against campgrounds but they are advocates for public recreation. If camping is eliminated from Turn or Matia Islands then State Parks will need to revisit their participation and presence on those islands. The deciding factors for State Parks involvement are: public interest, availability of staff for enforcement of changes, and the negative energy needed to tell public "not to camp" there.
- There is a lot of camping on weekend Turn Island; I could support limiting it to day use only.
- I am concerned that there may be a fire on Turn Island someday due to camping activity.

### Other Comments

- Visitors Services: We need some!
- We recommend the CCP/EA address human physical impacts to the habitats, such as loss of vegetation, trampling, litter, fire, etc.
- Allow recreational SCUBA diving with no harvest. This activity is very low impact, with a very high level of awareness.
- It is the Service's responsibility to correlate public uses on the Refuge with their impact to the Refuge's wildlife species. The CCP should include a method to inventory the impact of human activities on species populations.
- The CCP should examine the appropriateness of off-road vehicle (ORV) use on the refuge as related to the "Big Six" wildlife-dependent appropriate uses. ORV use can degrade habitat, trails, and impact wildlife. In addition, the noise generated by ORVs can degrade visitor experience. Hiking trails are a sufficient means of providing public access to the refuge and the "Big Six" uses.

## *Refuge Administration*

### Facilities and Structures

- The small tower on the SW portion of Smith Island is a USCG light and is the only facility still necessary for the USCG on the island. A NOAA weather station is also present on the tower. The tower light on Minor Island must remain.
- Do houses on Protection Island provide predator refuge to rhinoceros auklets?

### Signs

- The Whale Museum's signage inventory is now 10 years old. Can an updated inventory and plan for placing and maintaining signage that is consistent with the Wilderness Act be incorporated into the CCP?
- Signs may be the only way to inform visitors about access restrictions and buffer areas. Uniform and recognizable signs should be placed at kayak, motorboat, and sailboat launch sites.
- I can understand why signs are needed to identify refuge islands even if they are wilderness.
- Signage at Aleck Rock would be very helpful for reducing the trespass and inappropriate activity we witness each summer.
- I'd appreciate it if we had better signage on Swirl Rock and the other islands off of Flint Beach. Over the past 15 years, we have seen increasingly inappropriate use of these areas.
- USCG would consider placing refuge signage on buoys that are already located off refuge islands - federal agencies can own buoys for the purpose of placing signs.
- There may be alternative methods of marking islands such as buoys, fishing guides (to identify the islands), and WDFW fishing pamphlets.
- Interpretive signs at marinas may be helpful.

### Land Status

- Are there sites that might be appropriate to either keep as no access, change to public access, or even trade with the State Parks?
- Smith and Minor islands seem to be special on their own, but are not part of the Wilderness Area, I presume, due to the military presence. However, they are an important area to a variety of wildlife species including evidence of breeding elephant seals. I am curious whether they could become a separate refuge themselves much like Protection Island, or are they just too small?
- In a recent review of lands managed by state agencies, Turn Island was rated high for recreational potential and low for wildlife values. State Parks would be very interested in trading some of their islands with "high" wildlife values in exchange for Turn Island. Is the CCP a process that could be used to trade for Turn Island?
- Turn Rock is one of the WDFW fished-area study sites and there is concern about whether it could remain so under any new ownership.
- Two comments specifically support including the Zella M. Schultz Seabird Sanctuary within the Protection Island NWR.
- There are concerns about managing and enforcing the Zella M. Schultz Seabird Sanctuary section in conjunction with the NWR portion of the island. WDFW and USFWS might consider a land transfer with a few conditions: the land remains a seabird colony; the history of the island, including State acquisition history, is recognized; and the problems with WDFW biologists being restricted on use and access are addressed.



- Would a transfer of the Zella M. Schultz Seabird Sanctuary set a precedent and if so, does WDFW have other properties that a transfer of ownership would affect? If a transfer were to occur, the state would want to continue having a voice in the management of Protection Island.
- It's too bad the refuge doesn't have more islands.

#### Staffing and Volunteers

- The San Juan Islands NWR is far removed from the refuge office and covers too vast an area for existing staff to effectively monitor and enforce. Could the possibility of a part time, island-based NWR staff position be explored to help coordinate friends groups and conduct patrols and outreach?
- I hope that funding will be made available to provide for a Protection Island caretaker.
- The MRC encourages USFWS to explore development and use of local, citizen-based groups to help achieve refuge goals.
- We request evaluation of the potential for establishing a volunteer stewardship/surveillance network for the most ecologically significant of the wilderness islands. Such a network could greatly expand USFWS's ability to understand impacts on the resources it is charged to protect.
- Admiralty Audubon Society is interested in volunteer opportunities on Protection Island.
- Have you considered using the Coast Guard Auxillary Group to get the message out regarding which islands are part of the wildlife refuge?

#### Other Comments

- I am glad to see an emphasis on partnerships with regional and local agencies.
- We suggest the Refuge determine whether cooperatively managed NWR islands are achieving the ecological goals established in the MOU's which codified the management agreement. If clear ecological goals do not currently exist for these islands, the CCP should address this.
- Naming of unnamed islands in the refuges might provide a fundraising opportunity.

### ***Planning Process***

#### Planning Resources

- ❖ Several comments were received that suggest the use of particular scientific references and resources in the CCP development:
  - Don 2002
  - San Juan County Marine Stewardship Area Plan
  - Irvine 2005
  - Whale Museum/Sound Watch library
  - Cypress Island Natural Resource Conservation Area Plan
  - Canadian plans
  - Draft North Olympic Wildlife Area Plan (WDFW 05).

## Vision and Goals

- General support of the vision and goals.
- The goals for the San Juan Islands NWR are great! I like that the focus here seems to be protection first. The Refuge provides opportunities for wildlife viewing.
- The public may resonate strongly with a vision for the San Juan Islands NWR that states the total shoreline acreage and clearly champions a network of protected, diverse habitats.
- The vision for the San Juan Islands NWR should include specific stewardship measures in order to promote a stewardship ethic.
- The intertidal zone should be included in the Protection Island NWR goals. The relationship between the island and the surrounding tidelands is important.
- The management goal for these refuges must be to maintain habitat in as natural and pristine a state as possible.
- It is good to see that conducting and supporting research is included in the preliminary goals for the refuges.
- We encourage USFWS to maintain its "wildlife first" philosophy and to prescribe the best and most thorough protection for plants and wildlife.

## Other Comments

- We recommend the CCP/EA address tribal natural and cultural resources.
- Is there a process for making changes in the CCP if a dramatic change in habitat characteristics occurs during the plan lifecycle?
- I am excited to see that USFWS is actively engaged in planning the future of Protection Island and San Juan Islands NWRs.
- The wilderness and wildlife values of the refuge are truly outstanding and deserve the most careful and thorough planning process possible.
- As a key stakeholder, the MRC requests the opportunity to co-host a local, public meeting in San Juan County with USFWS to solicit public feedback on the conservation plan. We believe the most opportune time for such a meeting is after scoping comments are compiled and reviewed but before alternatives are outlined.
- There is a San Juan Islands Scenic Byway designation plan in progress through the San Juan Islands Visitors Bureau.

## **MAJOR ISSUES**

**Issues within the Scope of the CCP/EA.** The issues listed below are within the scope of the CCP/EA and are considered by the Service to be the major issues to address in the planning process.

**Threats to Refuge Resources.** What actions should the Service take to reduce threats to refuge wildlife and habitats including: oil spills and other contaminants; human disturbance to wildlife; deer impacts on Protection Island; marine debris; fisheries bycatch of seabirds and marine mammals; Canada geese impacts to native plant communities; invasive species; global climate change; and tidal energy development? Many of these threats are much larger in scope than just the Refuges. They will be addressed at various scales depending on available information and what is most appropriate and relevant to the Refuges.

**Refuge Buffers and Nearshore Management.** What partnerships and nearshore management tools would better protect refuge wildlife?

**Habitat Restoration:** What habitat restoration projects should the Service consider: e.g. restoration of former freshwater wetland and/or shoreline areas of Protection Island; converting European beach grass to native bunch grasses; providing native plant community refugia; habitat manipulation and introduction of rare or endangered butterflies?

**Wildlife:** Why have some refuge seabird colonies disappeared or declined and what actions should the Service undertake to address this?

**Wilderness Management:** How can the Service maintain or enhance the wilderness values of the San Juan Islands Wilderness Area?

**Research:** What criteria and process would direct on-refuge and nearby off-refuge research to better answer refuge management concerns? How can any negative impacts of research activities be minimized?

**Public Uses:** Are camping and pets on Turn and Matia Islands appropriate for the San Juan Islands NWR? What should the Service do to enhance public enjoyment, understanding, appreciation, and stewardship of refuge resources and the Puget Sound ecosystem? What quantity and types of refuge signs will best support refuge purposes and visitor awareness?

**Refuge Administration:** Can WDFW's Zella M. Schultz Seabird Sanctuary which is contiguous with Protection Island NWR be managed more cooperatively with the Refuge for the benefit of wildlife? Should the Service consider additional staff/and or caretaker positions for the San Juan Islands NWR area to protect refuge resources, provide visitor services, coordinate with other agencies and partners, develop a volunteer program, and conduct public outreach? What structures and facilities are needed for refuge administration and are there opportunities to remove other structures to enhance habitat conditions?